

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
at WINCHESTER

UNITED STATES OF AMERICA, )  
Plaintiff, ) 4:08-CR-35  
v. ) Judge Mattice/Carter  
ELIZABETH REIMERS )  
Defendant. )

**INDICTMENT**

**COUNTS 1 THROUGH 116**

The Grand Jury charges that on or about the dates listed below, in the Eastern District of Tennessee, the defendant, ELIZABETH REIMERS, did knowingly and intentionally dispense, and cause to be dispensed, quantities of the controlled substances listed below to the patients, with the initials indicated below, outside the scope of professional practice and not for a legitimate medical purpose; each such instance constituting a violation of Title 21, United States Code, Sections 841(a)(1) and (b), and Title 18, United States Code, Section 2:

<u>COUNTS</u>	<u>DATE</u>	<u>PATIENT'S INITIALS</u>	<u>CONTROLLED SUBSTANCE</u>	<u>SCHEDULE</u>
1	02/23/06	L.A.	Hydrocodone/APAP	III
2	02/23/06	L.A.	Endocet	II
3	02/27/06	L.A.	Hydrocodone/APAP	III
4	03/07/06	L.A.	Hydrocodone/APAP	III
5	03/07/06	L.A.	Endocet	II
6	03/13/06	L.A.	Endocet	II
7	03/14/06	L.A.	Hydrocodone/APAP	III
8	03/20/06	L.A.	Endocet	II
9	03/20/06	L.A.	Hydrocone/APAP	III
10	03/23/06	L.A.	Endocet	II

11	03/23/06	L.A.	Hydrocone/APAP	III
12	03/29/06	L.A.	Endocet	II
13	03/29/06	L.A.	Hydrocodone/APAP	III
14	04/05/06	L.A.	Hydrocodone/APAP	III
15	04/10/06	L.A.	Hydrocodone/APAP	III
16	04/17/06	L.A.	Hydrocodone/APAP	III
17	04/18/06	L.A.	Endocet	II
18	04/25/06	L.A.	Hydrocodone/APAP	III
19	04/27/06	L.A.	Endocet	II
20	05/01/06	L.A.	Hydrocodone/APAP	III
21	05/08/06	L.A.	Endocet	II
22	05/08/06	L.A.	Hydrocodone/APAP	III
23	06/01/05	C.D.	Oxycodone/APAP	II
24	06/07/05	C.D.	Endocet	II
25	06/08/05	C.D.	Alprazolam	IV
26	06/08/05	C.D.	Oxycodone	II
27	06/14/05	C.D.	Endocet	II
28	06/22/05	C.D.	Oxycodone/APAP	II
29	06/29/05	C.D.	Endocet	II
30	07/06/05	C.D.	Endocet	II
31	07/08/05	C.D.	Alprazolam	IV
32	07/08/05	C.D.	Hydrocodone/APAP	III
33	07/15/05	C.D.	Hydrocodone/APAP	III
34	07/22/05	C.D.	Hydrocodone/APAP	III
35	07/27/05	C.D.	Hydrocodone/APAP	III
36	10/21/05	D.M.	Oxydocone/APAP	II
37	10/26/05	D.M.	Hydrocodone/APAP	III
38	10/27/05	D.M.	Alprazolam	IV
39	11/04/05	D.M.	Oxycodone/APAP	II
40	11/15/05	D.M.	Hydrocodone/APAP	III
41	11/18/05	D.M.	Endocet	II
42	11/18/05	D.M.	Oxycodone/APAP	II
43	11/21/05	D.M.	Alprazolam	IV
44	12/02/05	D.M.	Hydrocodone/APAP	III
45	12/02/05	D.M.	Oxycodone/APAP	II
46	12/06/05	D.M.	Hydrocodone/APAP	III
47	12/16/05	D.M.	Oxycodone/APAP	II
48	12/21/05	D.M.	Alprazolam	IV
49	12/21/05	D.M.	Hydrocodone/APAP	III
50	12/29/05	D.M.	Oxycodone/APAP	II
51	01/06/06	D.M.	Hydrocodone/APAP	III
52	01/12/06	D.M.	Endocet	II
53	01/12/06	D.M.	Oxycodone/APAP	II
54	05/02/05	K.B.	Hydrocodone/APAP	III

55	05/13/05	K.B.	Hydrocodone/APAP	III
56	05/13/05	K.B.	Oxycodone/APAP	II
57	05/24/05	K.B.	Oxycodone/APAP	II
58	10/13/06	K.B.	Xanax	IV
59	10/25/06	K.B.	Lortab	III
60	04/20/05	J.D.	Hydrocodone/APAP	III
61	04/25/05	J.D.	Hydrocodone/APAP	III
62	04/28/05	J.D.	Hydrocodone/APAP	III
63	04/29/05	J.D.	Hydrocodone/APAP	III
64	04/30/05	J.D.	Hydrocodone/APAP	III
65	05/03/05	J.D.	Hydrocodone/APAP	III
66	05/07/05	J.D.	Hydrocodone/APAP	III
67	05/10/05	J.D.	Hydrocodone/APAP	III
68	05/21/05	J.D.	Hydrocodone/APAP	III
69	05/25/05	J.D.	Hydrocodone/APAP	III
70	06/03/05	J.D.	Hydrocodone/APAP	III
71	06/07/05	J.D.	Hydrocodone/APAP	III
72	06/10/05	J.D.	Hydrocodone/APAP	III
73	06/13/05	J.D.	Hydrocodone/APAP	III
74	06/16/05	J.D.	Alprazolam	IV
75	06/21/05	J.D.	Hydrocodone/APAP	III
76	06/24/05	J.D.	Hydrocodone/APAP	III
77	06/28/05	J.D.	Hydrocodone/APAP	III
78	11/07/05	D.P.	Endocet	III
79	11/21/05	D.P.	Endocet	III
80	12/05/05	D.P.	Endocet	III
81	12/19/05	D.P.	Endocet	III
82	01/03/06	D.P.	Endocet	III
83	01/17/06	D.P.	Endocet	III
84	10/03/06	A.W.	Oxycodone/HCL	II
85	10/06/06	A.W.	Oxycodone/APAP	II
86	10/23/06	A.W.	Oxycodone/APAP	II
87	10/30/06	A.W.	Oxycodone/HCL	II
88	11/03/06	A.W.	Oxycodone/HCL	II
89	11/09/06	A.W.	Oxycodone/APAP	II
90	11/20/06	A.W.	Oxycodone/APAP	II
91	11/21/06	A.W.	Alprazolam	IV
92	11/29/06	A.W.	Oxycodone/HCL	II
93	11/29/06	A.W.	Oxycodone/HCL	II
94	12/09/06	A.W.	Oxycodone/APAP	II
95	12/28/06	A.W.	Oxycodone/HCL	II
96	12/30/06	A.W.	Oxycodone/APAP	II
97	08/01/06	“J.Matthews”	Lortab	III
98	08/17/06	“J.Matthews”	Percocet	II

99	08/31/06	“J.Matthews”	Percocet	II
100	09/06/06	“J.Matthews”	Mepergan Fortis	II
101	09/20/06	“J.Matthews”	Mepergan Fortis	II
102	09/20/06	“J.Matthews”	Morphine (MSIR)	II
103	10/12/06	“J.Matthews”	Mepergan Fortis	II
104	10/12/06	“J.Matthews”	Morphine	II
105	11/09/06	“J.Matthews”	Mepergan Fortis	II
106	11/09/06	“J.Matthews”	Morphine (MSIR)	II
107	12/08/06	“J.Matthews”	Mepergan Fortis	II
108	12/08/06	“J.Matthews”	Morphine (MSIR)	II
109	01/17/07	“J.Matthews”	Mepergan Fortis	II
110	01/17/07	“J.Matthews”	Morphine (MSIR)	II
111	03/29/07	“J.Matthews”	Mepergan Fortis	II
112	03/29/07	“J.Matthews”	Morphine (MSIR)	II
113	10/27/06	“D. Allen”	Percocet	II
114	11/09/06	“D. Allen”	Percocet	II
115	12/08/06	“D. Allen”	Percocet	II
116	01/17/07	“D. Allen”	Percocet	II

COUNTS 117 THROUGH 130

The Grand Jury also charges that on or about the dates listed below, in the Eastern District of Tennessee, the defendant, ELIZABETH REIMERS, did knowingly and intentionally dispense, and cause to be dispensed, quantities of the controlled substances listed below to the patients, with the initials indicated below, outside the scope of professional practice and not for a legitimate medical purpose, resulting in the deaths of J.B., D.M.M. and D.Pa. from use of the controlled substances; each such instance constituting a violation of Title 21, United States Code, Sections 841(a)(1) and (b) and Title 18, United States Code, Section 2:

<u>COUNTS</u>	<u>DATE</u>	<u>PATIENT'S INITIALS</u>	<u>CONTROLLED SUBSTANCE</u>	<u>SCHEDULE</u>
117	01/20/06	J.B.	Xanax	IV
118	01/20/06	J.B.	MS Contin	II
119	01/06/05	D.M.M.	Mepergan Fortis	II
120	01/10/05	D.M.M.	Demerol	II
121	02/07/05	D.M.M.	Xanax	IV
122	03/02/05	D.M.M.	Mepergan Fortis	II
123	05/16/05	D.M.M.	Valium	IV
124	05/26/05	D.M.M.	Lortab	III
125	05/26/05	D.M.M.	Duragesic Patch (Fentanyl)	II
126	09/19/06	D.Pa.	Xanax	IV
127	09/19/06	D.Pa.	Percocet	III
128	09/19/06	D.Pa.	Hycotuss	III
129	09/19/06	D.Pa.	Fiorinal with Codeine	III
130	09/19/06	D.Pa.	Demerol (injectable)	II

A TRUE BILL:

/s/ Grand Jury Foreperson  
GRAND JURY FOREPERSON

JAMES R. DEDRICK  
UNITED STATES ATTORNEY

By: /s/ John P. MacCoon  
John P. MacCoon  
Assistant United States Attorney